

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
Case No. 19-23994-CV-ALTONAGA/Goodman**

ROBERT M. GLEN,

Plaintiff,

v.

AMERICAN AIRLINES, INC.,

Defendant.

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**NOTICE OF SUPPLEMENTAL AUTHORITY**

Plaintiff Robert M. Glen (“Plaintiff”) respectfully submits this Notice of Supplemental Authority in support of his Response to Defendant American Airlines, Inc.’s Motion to Dismiss the Amended Complaint, or, in the Alternative, to Transfer Venue (Dkt. 56). On April 15, 2020, Judge Bloom entered an Order in *Havana Docks Corp. v. Norwegian Cruise Line Holdings, Ltd.*, No. 19-CV-23591 (S.D. Fla.) that granted the plaintiff’s motion for reconsideration and for leave to amend, vacated a prior Order dismissing the case, and re-opened the action. The Order is attached hereto as Exhibit A.

The Order resolves several issues of statutory construction under the Helms-Burton Act, including the scope of the private right of action for unlawful trafficking and the property interests for which a plaintiff may bring a Helms-Burton Act claim. These issues were raised by American Airlines in its motion to dismiss and were addressed by Plaintiff in his responsive memorandum.

Dated: April 15, 2020

Respectfully submitted,

/s/ Joel Ewusiak

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on April 15, 2020, the foregoing document was filed using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ Joel Ewusiak  
Joel Ewusiak